

10 CFR 50.90  
10 CFR 50, Appendix E  
10 CFR 50.4

RS-15-082  
RA-15-019  
TMI-15-034

March 2, 2015

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456, 50-457, and 72-73

Byron Station, Units 1 and 2  
Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. 50-454, 50-455, and 72-68

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 1, 2 and 3  
Facility Operating License No. DPR-2  
Renewed Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237, 50-249, and 72-37

LaSalle County Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373, 50-374, 72-70

Limerick Generating Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352, 50-353, and 72-65

Oyster Creek Nuclear Generating Station  
Renewed Facility Operating License No. DPR-16  
NRC Docket Nos. 50-219 and 72-15

Peach Bottom Atomic Power Station, Units 1, 2 and 3  
Facility Operating License DPR-12  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-171, 50-277, 50-278 and 72-29

AX45  
FSME20  
NIMSS26  
NLF  
NMSS

Quad Cities Nuclear Power Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254, 50-265, and 72-53

Three Mile Island Nuclear Station, Unit 1  
Renewed Facility Operating License No. DPR-50  
NRC Docket No. 50-289

Three Mile Island Nuclear Station, Unit 2  
Facility Possession-Only No. DPR-73  
NRC Docket No. 50-320

Subject: Response to Request for Additional Information  
License Amendment Request to Adopt Emergency Action Level Schemes  
Pursuant to NEI 99-01, Revision 6, *"Development of Emergency Action Levels for Non-Passive Reactors"*

- References:
- 1) Letter from James Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission - License Amendment Request to Adopt Emergency Action Level Schemes Pursuant to NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," dated May 30, 2014 (ML14164A054)
  - 2) U.S. Nuclear Regulatory Commission Electronic Mail Preliminary Request for Information Regarding Emergency Action Level Fleet Amendments, dated November 11, 2014

By letter dated May 30, 2014 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a license amendment request to support changes to the Emergency Plans for the facilities listed above. Specifically, the proposed changes involve revising the Emergency Plans for the affected facilities to adopt the Nuclear Energy Institute's (NEI's) revised Emergency Action Level (EAL) schemes described in NEI 99-01, Revision 6, *"Development of Emergency Action Levels for Non-Passive Reactors,"* which have been endorsed by the NRC as documented in an NRC letter dated March 28, 2013.

10 CFR 50, Appendix E, Section IV.B.2 stipulates that a licensee desiring to change its entire EAL scheme shall submit an application for an amendment to its license and receive NRC approval before implementing the change. Exelon's currently approved Emergency Plan EAL schemes are based on the guidance established in NEI 99-01, Revision 5, *"Methodology for Development of Emergency Action Levels."* Exelon is proposing to adopt the EAL schemes based on the latest NRC-endorsed guidance, which are described in NEI 99-01, Revision 6.

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Subsequently, in an electronic mail request dated November 11, 2014 (Reference 2), the NRC indicated that it had reviewed the information submitted in the Reference 1 letter. The NRC identified a number of preliminary questions concerning the proposed EAL changes and requested additional clarifying information to support its continued review. The preliminary questions in Reference 2 were further discussed during teleconferences on December 2, 2014, and January 8, 2015, between Exelon and NRC representatives.

Accordingly, Attachment 1 provides Exelon's response to the request for information contained in the Reference 2 electronic mail message. Attachment 1 also includes additional information requesting minor clarifying changes to other EALs as a result of the discussions with the NRC. Attachments 2 through 12 include revised red-line markups along with revised clean pages of the affected EALs and supporting Basis information for each of the plants.

Exelon has reviewed the information supporting a finding of No Significant Hazards Consideration and the Environmental Consideration provided to the NRC in the Reference 1 letter. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the additional information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments contained in this submittal.

If you have any questions concerning this submittal, please contact Richard Gropp at (610) 765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 2nd day of March 2015.

Respectfully,



James Barstow  
Director, Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

Attachments:

- Attachment 1 - Response to the Request for Additional Information - License Amendment Request to Adopt Emergency Action Level Schemes Pursuant to NEI 99-01, Revision 6, *"Development of Emergency Action Levels for Non-Passive Reactors"*

- Attachment 2 - Revised Radiological Emergency Plan Annex Information for Braidwood Station
- Enclosure 2A - EAL Comparison Matrix Document
  - Enclosure 2B - EAL Red-Line Basis Document
  - Enclosure 2C - EAL Basis Document
- Attachment 3 - Revised Radiological Emergency Plan Annex Information for Byron Station
- Enclosure 3A - EAL Comparison Matrix Document
  - Enclosure 3B - EAL Red-Line Basis Document
  - Enclosure 3C - EAL Basis Document
- Attachment 4 - Revised Radiological Emergency Plan Annex Information for Clinton Power Station
- Enclosure 4A - EAL Comparison Matrix Document
  - Enclosure 4B - EAL Red-Line Basis Document
  - Enclosure 4C - EAL Basis Document
- Attachment 5 - Revised Radiological Emergency Plan Annex Information for Dresden Station
- Enclosure 5A - EAL Comparison Matrix Document
  - Enclosure 5B - EAL Red-Line Basis Document
  - Enclosure 5C - EAL Basis Document
- Attachment 6 - Revised Radiological Emergency Plan Annex Information for LaSalle County Station
- Enclosure 6A - EAL Comparison Matrix Document
  - Enclosure 6B - EAL Red-Line Basis Document
  - Enclosure 6C - EAL Basis Document
- Attachment 7 - Revised Radiological Emergency Plan Annex Information for Limerick Generating Station
- Enclosure 7A - EAL Comparison Matrix Document
  - Enclosure 7B - EAL Red-Line Basis Document
  - Enclosure 7C - EAL Basis Document
- Attachment 8 - Revised Radiological Emergency Plan Annex Information for Oyster Creek Nuclear Generating Station
- Enclosure 8A - EAL Comparison Matrix Document
  - Enclosure 8B - EAL Red-Line Basis Document
  - Enclosure 8C - EAL Basis Document
- Attachment 9 - Revised Radiological Emergency Plan Annex Information for Peach Bottom Atomic Power Station
- Enclosure 9A - EAL Comparison Matrix Document
  - Enclosure 9B - EAL Red-Line Basis Document
  - Enclosure 9C - EAL Basis Document

**Attachment 10 - Revised Radiological Emergency Plan Annex Information for Quad Cities Nuclear Station**

- Enclosure 10A - EAL Comparison Matrix Document
- Enclosure 10B - EAL Red-Line Basis Document
- Enclosure 10C - EAL Basis Document

**Attachment 11 - Revised Radiological Emergency Plan Annex Information for Three Mile Island Station**

- Enclosure 11A - EAL Comparison Matrix Document
- Enclosure 11B - EAL Red-Line Basis Document
- Enclosure 11C - EAL Basis Document

cc: w/o Attachments (CD copy)

Regional Administrator – NRC Region I  
Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Braidwood  
NRC Senior Resident Inspector – Byron  
NRC Senior Resident Inspector – Clinton  
NRC Senior Resident Inspector – Dresden  
NRC Senior Resident Inspector – LaSalle  
NRC Senior Resident Inspector – Limerick  
NRC Senior Resident Inspector – Oyster Creek  
NRC Senior Resident Inspector – Peach Bottom  
NRC Senior Resident Inspector – Quad Cities  
NRC Senior Resident Inspector – Three Mile Island  
NRC Project Manager, NRR – Exelon Fleet  
NRC Project Manager, NRR – Braidwood  
NRC Project Manager, NRR – Byron  
NRC Project Manager, NRR – Clinton  
NRC Project Manager, NRR – Dresden  
NRC Project Manager, NRR – LaSalle  
NRC Project Manager, NRR – Limerick  
NRC Project Manager, NRR – Oyster Creek  
NRC Project Manager, NRR – Peach Bottom  
NRC Project Manager, NRR – Quad Cities  
NRC Project Manager, NRR – Three Mile Island  
R. R. Janati, Commonwealth of Pennsylvania  
S. Gray, State of Maryland  
Director, Bureau of Nuclear Engineering, New Jersey  
Department of Environmental Protection  
Illinois Emergency Management Agency  
Division of Nuclear Safety